INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We make Indiana a cleaner, healthier place to live.*

*Joseph E. Kernan*
Governor

*Lori F. Kaplan*
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 9, 2003

TO: Interested Parties / Applicant

RE: Better Way Partners LLC, dba Better Way Products / 039-17869-00141

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

## Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

October 9, 2003

Mr. Bruce Korenstra
Better Way Partners LLC, dba Better Way Products
70891 C. R. 23
New Paris, IN 46996

Re: 039-17869
Third Significant Permit Modification to
Part 70 No.: T 039-7106-00141

Dear Mr. Korenstra:

Better Way Partners LLC, dba Better Way Products was issued a Part 70 permit T039-7106-00141 on December 30, 1999, for a fiberglass parts manufacturing operation. A letter requesting changes to this permit was received on June 9, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the PSD Minor limit for VOC to 244 tons per year, and the addition of one (1) gel coat booth and one (1) Resin Transfer Molding operation. In addition, the requirements of 326 IAC 20-25 were added to the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

## Better Way Partners LLC dba Better Way Products, Inc.
## 70891 C.R. 23
## New Paris, Indiana 46553

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T039-7106-00141 | |
|---|---|
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: December 30, 1999 |

1st Administrative Amendment No. 039-12115 Issued on: July 6, 2000
1st Significant Permit Modification No. 039-12527 Issued on: November 2, 2000
2nd Significant Permit Modification No. 039-17623 Issued on: July 25, 2003

| 3rd Significant Permit Modification No.: 039-17869 | Pages Modified:3, 4, 5, 5a, 26, 27, 28, 29, 30, 31, 32, 33, 37 |
|---|---|
| Issued by: Original Signed by Paul Dubenetzky<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: October 9, 2003 |

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a fiberglass lamination production plant.

| | |
|---|---|
| Responsible Official: | Bruce Korenstra |
| Source Address: | 70891 C. R. 23, New Paris, Indiana 46553 |
| Mailing Address: | 70891 C. R. 23, New Paris, Indiana 46553 |
| Phone Number: | (574) -831-3340 |
| SIC Code: | 3089 |
| County Location: | Elkhart |
| County Status: | Attainment for all criteria pollutants |
| | Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program |
| | Major Source, Section 112 of the Clean Air Act |
| | Minor Source, under PSD or Emission Offset Rules; |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

**Plant 2:**

(a) Gelcoat booth, identified as P2-G, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack S4.

(b) Resin chop area, identified as P2-R, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S7 and S8.

(c) Gelcoat/resin chop application area, identified as P2-LTGR for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S2 and S3.

(d) Grinding area, identified as P2-GRIND with two (2) grinders, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stacks S5 and S6.

**Plant 1:**

(e) Two (2) gelcoat booths, known as P1-G1 and P1-G2, each equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively.

(f) One (1) resin booth, known as P1-R, equipped with air-assisted airless spray applicators,

equipped with dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13.



(g) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control**,** exhausting to stacks S9 and S10.

(h) One (1) Resin Transfer Molding (RTM) area, using a closed molding process, using 30,000 pounds per year of styreneated resins.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, mold release, use of sealers, primers, wood glues, and promoter solutions, mold repair activities, and grinding.

(f) The following activities in Plant 1 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: application of coatings and adhesives to bumpers, using an air atomization spray gun.

(g) The following activities (associated with gelcoat application booths) with emissions below exemption levels as defined in 326 IAC 2-1.1-3: use of a liquid organic peroxide use to initiate polymerization reaction; and the use of liquid resin films to assist with resin application as required, using a dedicated airless air-assisted spray gun in each booth.

(h) Manual application of putty, bonding agents, patches, buffing compounds, and filler materials in Plant 1 and Plant 2 for minor product repairs.

(i) The following activities in Plant 1 and Plant 2 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: application of layout fluid to look for cracks and defects.

## A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

**Plant 2:**

(a) Gelcoat booth, identified as P2-G, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack S4.

(b) Resin chop area, identified as P2-R, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S7 and S8.

(c) Gelcoat/resin chop application area, identified as P2-LTGR for applying resins and gelcoats, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S2 and S3.

(d) Grinding area, identified as P2-GRIND with two (2) grinders, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stacks S5 and S6.

**Facility Description [326 IAC 2-7-5(15)**

**Plant 1:**

(e) Two (2) gelcoat booths, known as P1-G1 and P1-G2, each equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively.

(f) One (1) resin booth, known as P1-R, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, capacity: 7.5 fiberglass parts per hour, exhausting to stack S13.

(g) One (1) grinding area, identified as P1-GRIND, with two (2) hand grinders, with a maximum capacity of 7.5 fiberglass parts per hour, using dry filters for PM control**,** exhausting to stacks S9 and S10.

(h) One (1) Resin Transfer Molding (RTM) area, using a closed molding process, using 30,000 pounds per year of styreneated resins.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)



**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than 244 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) *
EF (VOC monomer emission factor for resin or gel coat used, %);

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, July 23, 2001. The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

(a) For Plant No. 2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6 (BACT).

(b) For gelcoat spray booth P1-G1 and resin booth P1-R in Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC 2-4.1-1, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight. For gelcoat spray booth P1-G2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6.

(c) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the new gelcoat booth identified as P1-G1 in Plant No. 1 and all open molding processes in Plant No. 2 at this reinforced plastics composites fabricating facility shall comply with the provisions of the rule on or after January 1, 2002, including:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:



| Fiber Reinforced Plastics Composites Products Except Watercraft | HAP Monomer Content, Weight Percent |
|---|---|
| Resin, manual or mechanical application | 48 |
| Production - Specialty products | 35 |
| Production - Non-corrosion resistant unfilled | 38 |
| Production - Non-corrosion resistant filled | 38 |
| Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet | 42 |
| Production - Class I, Flame and Smoke | 60 |
| Shrinkage controlled | 52 |
| Tooling | 43 |

| | |
|---|---|
| Gelcoat application | |
| Production - Pigmented | 37 |
| Clear production | 44 |
| Tooling | 45 |
| Production - pigmented, subject to ANSI standards | 45 |
| Production - clear, subject to ANSI standards | 50 |

(b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty products resins from all sources.
(3) Tooling resins used in the manufacture of water craft.
(4) Production resin used for Class I flame and smoke products.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure.
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) Cleaning operations for resin and gel coat application equipment are as follows:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.



(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(e) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:

For Averaging within a category:

$\sum Em_A \leq \sum (M_R * E_a)$

Where:

$M_R$ = Total monthly mass of material within each category
$E_a$ = Emission factor for each material based on allowable monomer content and allowable application method for each category.
$Em_A$ = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls.

(f) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (a) through (d).
(1) Use of monthly emissions averaging for any or all of the material or application categories

listed in subsection (a) if the following conditions are met:

(A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (a) through (c).
(B) The source uses any one (1) or a combination of the following emission reduction techniques:

(i) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).
(ii) Vapor suppressed resins.
(iii) Vacuum bagging or other similar technique.
(iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
(v) controlled spray used in combination with automated actuators or robots.
(vi) Controlled spray that includes the following:

(AA) Mold flanges.
(BB) Spray technique.
(CC) Spray gun pressure.
(DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.



(g) To determine emission estimates, the following references or methods shall be used:

(1) "Unified Emission Factors for Open Molding of Composites", July 23, 2001, except use of controlled spray emission factors must be approved by the commissioner.
(2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.
(3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) The PM from the fiberglass lamination production processes in Plant 1 and Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations in Plant 2, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour, and the PM from the grinding operations in Plant 1 shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.1.6 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4 (Work Practices Standards):

On or Before March 1, 2001, each owner or operator of a source or emission unit subject to this rule shall operate in accordance with the following work practices standards:

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
(b) Except for mixing containers as described in subsection (7), HAP containing materials shall be in a closed container when not in use.
(c) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.
(d) Solvent collection conditions shall be kept closed when not in use.
(e) Clean-up rags with solvent shall be closed when not in use.
(f) Closed containers shall be used for the storage of the following:
(1) All production and tooling resins that contain HAPs.
(2) All production and tooling gel coats that contain HAPs.
(3) Waste resins and gel coats that contain HAPs.



(4) Cleaning materials, including waste cleaning materials.
(5) Other materials that contain HAPs.
(g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.

D.1.7 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8 (Operator Training):
All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications ( for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(a) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.

(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.

(e) If the result of an evaluation shows that training is needed, such training shall occur within

fifteen (15) days of the evaluation.

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
(1) Appropriate application techniques.
(2) Appropriate equipment cleaning procedures.
(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D 1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D1.9 Testing Requirements [326 IAC 2-7-6(),(6)][326IAC 2-1.1-11]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance with the HAP monomer content limitations in Condition D.1.3 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.
(b) The manufacturer's material safety data sheet.
(c) Sampling and analysis, using one of the following test methods, as applicable:



(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and VOC content of resins and gel coats. Method 24 may be modifieed for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternative method approved by IDEM/OAQ.

D.1.10 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.11 Particulate Matter (PM)

Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding area in Plant 2 is in operation. The dust collector shall be in operation at all times when the grinding area in Plant 1 is in operation.

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, S4, S7, S8, S11, S12, and S13) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP monomer usage limits and/or the VOC and HAP monomer emission limits established in Condition D.1.1, D.1.2, and D.1.3.

(1) The amount and VOC and HAP monomer content of each resin and gel coat used content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;



(2) A log of the dates of use;

(3) The non-acetone cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(f) Method of application and other emission reduction techniques for each resin and gel coat used; and

(g) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(b) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.7, the permittee shall maintain the following training records:

(1) A copy of the current training program.
(2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training pograms and former personnel are not required to be maintained.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.3 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Better Way Partners LLC DBA Better Way Products
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141
Facility: Plant 1 and Plant 2
Parameter: VOC
Limit: Less than 244 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | VOC This Month | VOC Previous 11 Months | VOC 12 Month Total |

| | | | |
|---|---|---|---|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# Indiana Department of Environmental Management
# Office of Air Quality

Addendum to the
Technical Support Document for Significant Source Modification and
Significant Permit Modification to Part 70 Permit

| | |
|---|---|
| Source Name: | Better Way Partners LLC, dba Better Way Products |
| Source Location: | 70891 C. R. 23, New Paris, Indiana 46996 |
| County: | Elkhart |
| Part 70 Permit No.: | T039-7106-00141 |
| Significant Source Modification No.: | 039-17829 |
| Significant Permit Modification No.: | 039-17869 |
| SIC Code: | 3089 |
| Permit Reviewer: | Madhurima D. Moulik |

On July 19, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Better Way Partners LLC, dba Better Way Products, had applied for a Significant Source Modification and Significant Permit Modification to Part 70 permit No. T039-7106-00141. The notice also stated that OAQ proposed to issue the Significant Source Modification and Significant Permit Modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Source Modification and Significant Permit Modification should be issued as proposed.

On August 18, 2003, Better Way Partners, LLC, dba Better Way Products submitted comments on the proposed significant source modification and significant permit modification. The summary of the comments and corresponding responses is as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) **Comment**:

The phone number listed in Section A.1 should be changed.

**Response**:

Section A.1 is modified as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a fiberglass lamination production plant.

Responsible Official: Bruce Korenstra
Source Address: 70891 C. R. 23, New Paris, Indiana 46553
Mailing Address: 70891 C. R. 23, New Paris, Indiana 46553
Phone Number: ~~(219) 831-3340~~ **574-831-3340**

(2) **Comment**:

The area identified as P2-LTGR will be used to apply both resins and gelcoat, and not just Lite-gran coating. The description should be changed in sections A.2 and D.1.

**Response**:

The facility descriptions will be modified in sections A.2 and D.1. The facility descriptions in sections A.2 and D.1 are modified as follows:

~~Lite-gran coating~~ **Gelcoat/resin chop application** area, identified as P2-LTGR, for applying **resins and gelcoats** ~~and lite-gran coating only~~, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stacks S2 and S3.

(3) **Comment**:

The two (2) gelcoat booths in A.2(e) and D.1 should be correctly identified as P1-G1 and P1-G2, and descriptions of exhaust fans deleted.

**Response**:

Section A.2 and D.1 are modified as follows:

(e) Two (2) gelcoat booths, known as P1-G1 and ~~P2~~ **P1**-G2, each equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, ~~equipped with a 22,800 cubic feet per minute exhaust fan~~, each with capacity: 7.5 fiberglass parts per hour, exhausting to stacks S11 and S12, respectively.

(4) **Comment**:

The exhaust system in the grinding area in Plant #1 (P1-GRIND) has been modified to match the exhaust system in Plant # 2 grinding area. Therefore, the description of P1-GRIND should be changed in sections A.2 and D.1.

**Response**:

The description in sections A.2 and D.1 are modified as follows:

(g) One (1) grinding area, **identified as P1-GRIND,** ~~equipped~~ with two (2) hand grinders, ~~known as P1-GRIND, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan,~~ **with a maximum** capacity **of** 7.5 fiberglass parts per hour, **using dry filters for PM control,** exhausting to stacks S9 and S10.

(5) **Comment**:

The description of insignificant activities under section A.3(j) should be modified to include general raw material categories instead of specific product trade names to allow for operational flexibility.

**Response**:

The description in A.3(j) is modified as follows:

(j) The following activities in Plant 1 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: application of **coatings and adhesives** ~~a black coating (Black Flat Lacquer)~~ to bumpers, using an air atomization spray gun. ~~; application of an adhesive product called IPS Adhesive and Applicator to glue metal screens to plastic bumpers, using an air atomization spray gun.~~

(6) **Comment**:

The description of insignificant activities under section A.3(k) should be modified to allow for operational flexibility.

**Response**:

A.3(k) is modified as follows:

(k) The following activities (associated with gelcoat application booths) with emissions below exemption levels as defined in 326 IAC 2-1.1-3: use of a liquid organic peroxide use to initiate polymerization reaction; **and the use of liquid resin films** ~~small quantities of Magnum Shield 1050 (Blue)~~ to assist with resin application **as required**, using a dedicated airless air-assisted spray gun in each booth.

(7) **Comment**:

The description of insignificant activities under section A.3(l) should be modified to allow for operational flexibility, and the insignificant natural gas-fired sources all combined under one item.

**Response**:

A.3 is modified as follows:

~~(f) Four (4) natural gas-fired infrared space heaters in Plant 1, capacity: 0.125 million British thermal units per hour, each.~~

~~(g) Four (4) natural gas-fired radiant space heaters in Plant 1, capacity: 0.150 million British thermal units per hour, each.~~

~~(h) One (1) natural gas-fired air make-up unit in Plant 1, capacity: 4.1 million British thermal units per hour.~~

~~(i) Two (2) natural gas-fired office furnaces in Plant 1, capacity: 0.100 million British thermal units per hour, each.~~

(l) Manual application ~~out~~ of ~~a tube of Laminex Fillet Putty~~ **putty, bonding agents, patches, buffing compounds, and filler materials in** Plant 1 and Plant 2 for minor **product** repairs.

(8) **Comment**:

A.3(m) should be deleted since the application of packaging foam does not constitute an air-emissions unit.

**Response**:

A.3(m) is deleted as follows:

~~(m) Application of a two-part packaging foam called Instapak to protect final fiberglass parts during shipment.~~

(9) **Comment**:

A.3(n) should be modified to allow for operational flexibility.

**Response**:

A.3(n) is modified as follows:

(~~n~~ **i**) The following activities in Plant 1 and Plant 2 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: **application of layout fluid** ~~a blue layout fluid called Steel Blue DX-100~~ to look for cracks and defects.

(10) **Comment**:

Condition D.1.1(b) references the CFA fiberglass open molding emission factors updated in April 1999. These factors have since been updated in July 2001.

**Response**:

Sections D.1.1, D.1.2 and D.1.3 are modified to refer to the latest updated emission factors for open molding as follows:

D.1.1(a) ....

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, ~~April 1999~~ **July 23**, **2001**. The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.2(a)(1) .....

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, ~~April 1999~~ **July 23**, **2001**, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.3 (a) .... (f)

(g) To determine emission estimates, the following references or methods shall be used:

(8) "Unified Emission Factors for Open Molding of Composites", ~~April 1999~~ **July 23, 2001**, except use of controlled spray emission factors must be approved by the commissioner.

(11) **Comment**:

The regulation cited in Condition D.1.2(b) is incorrect and should be changed to 326 IAC2-4.1-1. In addition, since the new gelcoat booth P1-G2 is subject to 326 IAC 20-25-3, Condition D.1.2(b) is made applicable to only the existing booth P1-G1.

**Response**:

Condition D.1.2(b) is modified as follows:

(b) For Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC **2-4.1-1** ~~2-1-3.4~~, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight.

(12) **Comment**:

The reference to a "fiberglass boat manufacturing facility" in Condition D.1.3 is incorrect and should be changed to "reinforced plastics composites fabricating facility".

**Response**:

D.1.3 is modified as follows:

D.1.3 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of this **reinforced plastics composites fabricating facility** ~~fiberglass boat manufacturing facility~~ shall comply with the provisions of the rule on or after January 1, 2002, including:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

(13) **Comment**:

In Condition D.1.3, which implements 326 IAC 20-25-3, Emission Standards for Reinforced Plastics Composites Fabricating, IDEM has inappropriately proposed to apply this state rule to the existing emission units. The proposed language should be changed to apply only to the new gelcoat booth P1-G2. Only the standards referring to Production Gelcoat Application should be included, and the existing emissions units should be allowed to operate under the permit conditions currently in place.

On Page 4 of the Technical Support Document, in the section "Justification for the Modification", IDEM states:

"In this application, the emission units being added are of the same type as existing

> emission units. However, some of the new units, as well as some of the permitted emission units are subject to the requirements of 326 IAC 20-25, which will be added to the permit."

It is true that the new gelcoat booth is of the same type as the existing gelcoat booth and the gun being added to the Resin application Area P2-R (formerly #3069) is of the same type as the existing guns in that area. However, only the new gelcoat booth is subject to 326 IAC 20-25; the existing emission units are not. Regarding the gun being added to resin application area P2-R, 326 IAC 20-25-3(e) states:

> "A source that was issued a permit pursuant to 326 IAC 2 on or after June 28, 1998, but prior to the effective date of this rule, and that obtained a revised best available control technology (BACT) determination in the permit for emission units, is not subject to this section until the permit is renewed, or the emission unit undergoes a modification that increases the potential to emit styrene".

Better Way Products was issued their Part 70 operating permit on December 30, 199 with the 326 IAC 8-1-6 BACT determination for their existing emission units revised to take into account the new Unified Emission Factors for the industry. Better Way Products therefore satisfies the first part of the applicability of Section 3(e).

Addition of a gun to resin application area P2-R is not, however, a modification that increases the potential to emit (PTE) styrene of this emission unit. The new gun will be used to apply to a different resin, which will eliminate the need for gun and line cleanings. The new gun will not be used at the same time as the other guns already used in resin application area P2-R. Thus, addition of the gun will not increase the throughput of this emission unit nor increase the amount of resin that can be applied. It will simply allow a more diverse mix of products to be laminated in the area. Hence, there is no increase in the styrene PTE of P2-R.

Furthermore, the entire source PTE is already limited to avoid the PSD program. This modification does not affect that emission limit, so for a second reason, the additional gun is not a modification that increases the PTE of the emission unit. For these reasons, addition of the gun to emission unit P2-R does not make 20-25 applicable to the emission unit.

**Response**:

Pursuant to 326 IAC 20-25-3(e), an emission unit is exempt from the requirements of this section if the source was issued a permit pursuant to 326 IAC 2 on or after June 28, 1998, but prior to the effective date of this rule, and that obtained a revised best available control technology (BACT) determination in the permit for the emission units, until the permit is renewed, or the emission unit undergoes a modification that increases the potential to emit styrene. The Office of Air Quality has made the determination that the change in the BACT language solely for the purpose of updating emission factors does not constitute a BACT revision. Since the BACT determination for P2-R has not been revised, 326 IAC 20-25-3 shall be applicable to P2-R, even though the additional gun does not increase the potential to emit of styrene from this emission unit.

However, according to 326 IAC 20-25-3(f), the requirements of this subsection are not applicable for "a new or reconstructed emission unit subject to 326 IAC 2-4.1-1". Therefore, the requirements of 326 IAC 20-25-3 shall not be applicable to any emission unit that is subject to 326 IAC 2-4.1-1.

Therefore, the Office of Air Quality has made the determination that 326 IAC 20-25-3 shall be applicable to all open molding activities in Plant 2, and the new gelcoat booth in Plant 1 identified as P1-G2. The existing gelcoat booth P1-G1 and the resin booth P1-R in Plant No. 1, which are

subject to 326 IAC 2-4.1-1, are therefore exempt from 326 IAC 20-25-3.

The following changes have been made to the permit condition D.1.3:

D.1.3 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators **of the new gelcoat booth identified as P1-G1 in Plant no. 1 and all open molding processes in Plant no. 2** at this reinforced plastic composites fabricating ~~fiberglass boat manufacturing~~ facility shall comply with the provisions of the rule on or after January 1, 2002, including:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

In addition, upon internal review, Office of Air Quality has decided to make the following changes

(14) Section D.1.3(b) is modified to correct a typographical error as follows:

(b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty **products** resins from all sources.
(3) Tooling resins used in the manufacture of water craft.
(4) Production resin used for Class I flame and smoke products.

(15) Since Rule 20-25 is more stringent than any of the existing BACT requirement listed in the permit, the BACT condition in D.1.2 is modified. 326 IAC 20-25-3 is applicable to all emission units in Plant 2, and the new gelcoat booth P1-G2 in Plant 1. The other subsections under 326 IAC 20-25 are applicable to all gelcoat and resin application booths in Plant 1 and Plant 2.

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

(a) **For Plant No. 2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6 (BACT).** ~~BACT/MACT for Plant No. 2 was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight. Compliance with this limit shall be determined based upon the following criteria:~~

(1) ~~Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.~~

(2) ~~Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, and shall not exceed 32.3% styrene emitted per weight of gel coat~~

~~applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.~~

(b) For **gelcoat spray booth P1-G1 and resin booth P1-R in** Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC 2-4.1-1, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight. **For gelcoat spray booth P1-G2, compliance with the requirements of 326 IAC 20-25 satisfies the requirements of 326 IAC 8-1-6.**

~~(c) Plant 1 and Plant 2 are subject to the following workplace standards:~~

~~(1) All resins and gelcoats will be applied with air-assisted airless spray applicators.~~

~~(2) Spray applicators will be cleaned with acetone.~~

~~(3) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.~~

~~(4) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.~~

~~(5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.~~

~~(6) The overspray shall be minimized by spraying as close as practical into the molds.~~

~~(7) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.~~

~~(8) Storage containers used to store VOC's materials shall be kept covered when not in use.~~

(~~d~~ **c**) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **Better Way Partners LLC dba Better Way Products, Inc.** |
| **Source Location:** | **70891 C. R. 23, New Paris, IN 46996** |
| **County:** | **Elkhart** |
| **SIC Code:** | **3089** |
| **Operation Permit No.:** | **T039-7106-00141** |
| **Operation Permit Issuance Date:** | **December 30, 1999** |
| **Significant Source Modification No.:** | **039-17829-00141** |
| **Significant Permit Modification No.:** | **039-17869-00141** |
| **Permit Reviewer:** | **Madhurima D. Moulik** |

The Office of Air Quality (OAQ) has reviewed a modification application from Better Way Products, Inc., relating to the operation of fiberglass lamination production.

**History**

Better Way Products, Inc. was issued a Part 70 permit on December 30, 1999. On April 17, 2003, Better Way Products, Inc., submitted an application to modify the source. The modifications requested include the addition of one (1) gelcoat booth and one (1) resin transfer molding (RTM) process to Plant No. 1 (identified as Plant No. 2 in Significant Permit Modification No. 039-12527). Also, in Plant No. 2 (identified as Plant No. 1 in Significant Permit Modification No. 039-12527), two (2) resin spray guns have been dedicated to the spraying of lite-gran coating for specialty products, and one (1) gun has been added to the resin application area identified as # 3069 (to be renamed P2-R in this source modification). In addition, the source has requested to adjust the source wide PSD minor VOC limit to 244 tons per year to accommodate insignificant amounts of VOC emissions from mold making activities in Plant No. 3.

In addition, Better Way Products, Inc. requested descriptive changes to the permit, which were incorporated into this Significant Source Modification and Significant Permit Modification.

**Source Definition**

This fiberglass lamination production company consists of three (3) plants, located at the following address:

(a) Plant 1, Plant 2, and Plant 3 are located at 70891 C. R. 23, New Paris, IN 46996.

Since the three (3) plants are located on the same property, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

**Permitted Emission Units and Pollution Control Equipment**

Plant 2:

(a) Gelcoat booth, identified as 0243, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

Plant 1:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, and grinding.

(f) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(g) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(h) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(i) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

**New Emission Units and Pollution Control Equipment**

(a) One (1) gelcoat booth, known as P1-G2, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(b) One (1) Resin Transfer Molding (RTM) area, using a closed molding process, with a maximum usage of 30,000 pounds per year of styreneated resins.

**Existing Approvals**

The source was issued a Part 70 Operating Permit T039-7106-00141 on December 30, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 039-12115, issued on July 6, 2000;

(b) First Significant Permit Modification No.: 039-12527, issued on November 2, 2000;

(c) First Reopening No.: 039-13212, issued on November 1, 2001; and

(d) Second Significant Permit Modification No.: 039-17623, issued on July 25, 2003.

Significant Permit Modification No. 039-17623 is related to re-designation of the source as a PSD minor source, including modifying the VOC PSD minor limit of 250 tons per year to be applied to the entire source. Earlier, Plant 1 and Plant 2 were individually subject to VOC limits for PSD purposes, with the entire source being PSD major for VOCs. This application is related to the addition of significant emission units, with potential to emit of VOCs exceeding 250 tons per year, which are subject to the requirements of 326 IAC 20-25. This modification will be limited to minor PSD levels.

**Enforcement Issue**

There are no enforcement action pending.

**Stack Summary**

| Stack ID | Operation |
|---|---|
| S1 | Plant 3 (resin/gelcoat spray booth) |
| S2 | Plant 2 (lite-gran spray booth) |
| S3 | Plant 2 (lite-gran spray booth) |
| S4 | Plant 2 (gelcoat spray booth) |
| S5 | Plant 2 (grinding) |
| S6 | Plant 2 (grinding) |
| S7 | Plant 2 (resin chop spray) |
| S8 | Plant 2 (resin chop spray) |
| S9 | Plant 1 (grinding) |
| S10 | Plant 1 (grinding) |
| S11 | Plant 1 (gelcoat spray 1) |
| S12 | Plant 1 (gelcoat spray 2) |
| S13 | Plant 1 (resin chop spray) |
| | |

**Justification for the Modification**

The Part 70 permit is being modified by a significant source modification and significant permit modification. According to 326 IAC 2-7-10.5(d)(9), a minor source modification may be used for the addition of emission units which have potential to emit greater than the minor source thresholds in 326 IAC 2-7-10.5(d)(4) but are of the same type that are already permitted only if the new units "comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units". In this application, the emission units being added are of the same type as existing emission units. However, some of the new units, as well as some of the permitted emission units are subject to the requirements of 326 IAC 20-25, which will be added to the Part 70 permit. In addition, the PSD minor limit for VOC will be modified from 250 tons per year to 244 tons per year. Therefore, a significant source modification will be issued. The significant source modification will be incorporated into the Part 70 permit with a significant permit modification, pursuant to 326 IAC 2-7-12(d)(1) which states in part that "every significant change in existing monitoring Part 70 permit terms or conditions" shall be considered significant.

**Recommendation**

The staff recommends to the Commissioner that the Significant Source Modification and the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 9, 2003. Additional information was received on June 23 and July 3, 2003.

**Emission Calculations for Modifications**

**Plant 1:**

Emissions from new gelcoat booth for RTM process:

According to the source, the new gelcoat booth in Plant No. 1 is identical to the existing gelcoat booth in Plant No.1.

Based on TSD Appendix A for CP No. 039-8708-00141:

New gelcoat booth potential to emit:

VOC = 191.05 tons per year

Styrene = 191.0 tons per year

Lead compounds = 0.122 tons per year

MEK = 16.56 tons per year

Ethyl Benzene = 9.94 tons per year

PM/PM-10 = 126.81 tons per year

New RTM Manufacturing area: (Emissions calculations submitted by source)

This area uses a closed molding process.

Styrene emissions = Wt. of resin x weight % styrene x Emission Factor (1%)

= 30,000 lb/yr x 0.38 x 0.01 = 114.0 lb/yr = 0.06 tons per year

**Plant 2:**

One resin application gun has been added to area identified as P2-R. Based on TSD for Part 70 No. T039-7106-00141, VOC emissions from one gun = 157.3 tons per year.
Methyl Methacrylate emissions = 23.8 tons per year.

Therefore, additional VOC (styrene) emissions = 157.3 tons per year
Additional methyl methacrylate emissions = 23.8 tons per year

Pounds of resin used per hour per gun = 317.4 pounds = 0.16 tons/hr
PM allowable emissions [based on 326 IAC 6-3-2] = E = 4.10 $P^{0.67}$ lb/hr, where P = 0.16 tons/hr

Therefore PTE of PM = 1.2 lb/hr = 5.2 tons/yr.

**Plant 3:**

The emissions from the resin/gelcoat application booth in Plant No. 3 were estimated to be insignificant in Significant Permit Mod. No. 039-12527-00141. Source estimates VOC (styrene) emissions of less than 5 tons per year.

**Potential To Emit of Source Before Modification**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

| Pollutant | Uncontrolled Potential To Emit [1] (tons/year) |
|---|---|
| PM | 89.6 [3] |
| PM-10 | 89.6 [3] |
| $SO_2$ | 0.014 |
| VOC | 659.6[2] |
| CO | 0.605 |
| $NO_x$ | 2.33 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Uncontrolled potential to Emit [1] (tons/year) |
|---|---|
| Styrene | >10 |
| Methyl Methacrylate | >10 |
| | |
| TOTAL | >25 |

[1] The potential to emit of pollutants is the total PTE for Plant 1 and Plant 2. Plant 2 data is based on Technical Support Document for Part 70 permit No. T039-7106-00141. Plant 1 data is based on Technical Support Document for CP No. 039-8708-00141.

[2] The source has opted to limit the total VOC potential to emit of Plant 1 and Plant 2 to less than 244 tons per year, in order to be classified as a minor source under PSD regulations.

[3] PM PTE for Plant No. 1 = allowable emissions from CP No. 039-8708-00141 for Plant No. 1.

**Potential To Emit of Modification**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 20.8 [1] |
| PM-10 | 20.8 [1] |
| $SO_2$ | Negligible |
| VOC | 348.4[2] |
| CO | Negligible |
| $NO_x$ | Negligible |

| HAP's | Potential To Emit (tons/year) |
|---|---|
| Styrene | >10 |
| MEK | >10 |
| Methyl Methacrylate | >10 |
| TOTAL | ***>25*** |

[1] PTE of new gelcoat operation in Plant No. 1 = allowable emissions for existing gelcoat operation in Plant No. 1 (see TSD for CPNo.: 039-8708-00141). PTE for one additional gun in P2-R = allowable emissions (see emissions calculations)

[2] The source has requested a source-wide VOC limit of 244 tons per year from significant emission units.

**Potential To Emit of Source After Modification**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 110.4 |
| PM-10 | 110.4 |
| $SO_2$ | 0.014 |
| VOC | 1000.8 |
| CO | 0.605 |
| $NO_x$ | 2.33 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Uncontrolled potential to Emit [1] (tons/year) |
|---|---|
| Styrene | >10 |
| Methyl Methacrylate | >10 |
| MEK | >10 |
| TOTAL | >25 |

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**County Attainment Status**

The source is located in Elkhart County.

| Pollutant | Status |
|---|---|
| PM-10 | attainment |
| $SO_2$ | attainment |
| $NO_2$ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21. See the State Rule Applicability for the source section.

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21. See the State Rule Applicability for the source section.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, with potential to emit of VOCs greater than 250 tons per year, has chosen to limit potential VOC emissions from emission units in Plant 1 and Plant 2 to 244 tons per year, including emissions from the new gelcoat booth and RMT manufacturing operation in Plant 1 and the additional resin application gun in Plant 2. Plant 3 VOC emissions are estimated to be less than 5 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source had submitted a Preventive Maintenance Plan (PMP) on November 7, 1996 for Part 70 No. T039-7106-00141. This PMP had been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source had submitted an Emergency Reduction Plan (ERP) on November 7, 1996 for Part 70 No. T039-7106-00141. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC for Elkhart county. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This rule is applicable to major sources that manufacture reinforced plastics composites manufacturing that use resins and gel coats that contain styrene in open molding processes, and have actual emissions of greater than three (3) tons per year of styrene.

This fiberglass parts manufacturing facility meets all of the above criteria. Therefore, the source is subject to the requirements of 326 IAC 20-25.

Pursuant to 326 IAC 20-25-3 (Styrene Rule):

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

| Fiber Reinforced Plastics Composites Products Except Watercraft | HAP Monomer Content, Weight Percent |
|---|---|
| Resin, manual or mechanical application | 48 |
| Production - Specialty products | 35 |
| Production - Non-corrosion resistant unfilled | 38 |
| Production - Non-corrosion resistant filled | 38 |
| Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet | 42 |
| Production - Class I, Flame and Smoke | 60 |
| Shrinkage controlled | 52 |
| Tooling | 43 |
| Gelcoat application | |
| Production - Pigmented | 37 |
| Clear production | 44 |
| Tooling | 45 |
| Production - pigmented, subject to ANSI standards | 45 |
| Production - clear, subject to ANSI standards | 50 |

(b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty resins from all sources.
(3) Tooling resins used in the manufacture of water craft.
(4) Production resin used for Class I flame and smoke products.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure.
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) Cleaning operations for resin and gel coat application equipment are as follows:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(e) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

$M_R$ = Total monthly mass of material within each category
$E_a$ = Emission factor for each material based on allowable monomer content and allowable application method for each category.
$Em_A$ = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

(f) Upon written application by the source, the commissioner may approve the following:

(1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (a) through (d).
(2) Use of monthly emissions averaging for any or all of the material or application categories listed in subsection (a) if the following conditions are met:

(A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (a) through (c).
(B) The source uses any one (1) or a combination of the following emission reduction techniques:
(i) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).
(ii) Vapor suppressed resins.
(iii) Vacuum bagging or other similar technique.
(iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
(v) controlled spray used in combination with automated actuators or robots.
(vi) Controlled spray that includes the following:
(AA) Mold flanges.
(BB) Spray technique.
(CC) Spray gun pressure.
(DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.
(viii) Emission reduction techniques approved under subdivision (1).

(g) To determine emission estimates, the following references or methods shall be used:

(1) "Unified Emission Factors for Open Molding of Composites", April 1999, except use of controlled spray emission factors must be approved by the commissioner.
(2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.
(3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

Pursuant to 326 IAC 20-25-4 (Work Practices Standards):

On or Before March 1, 2001, each owner or operator of a source or emission unit subject to this rule shall operate in accordance with the following work practices standards:

(1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
(2) Except for mixing containers as described in subsection (7), HAP containing materials shall be in a closed container when not in use.
(3) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.
(4) Solvent collection conditions shall be kept closed when not in use.
(5) Clean-up rags with solvent shall be closed when not in use.
(6) Closed containers shall be used for the storage of the following:
(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.

(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.

Pursuant to 326 IAC 20-25-8 (Operator Training):

All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications ( for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(a) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.

(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.

(e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.
(2) Appropriate equipment cleaning procedures.
(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

326 IAC 8-1-6 and 326 IAC 2-1-4.1 (BACT/MACT Conditions)

(a) BACT/MACT for Plant No. 1 was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per 12-month period with compliance determined at the end of each month, a maximum styrene content of the resins used of 60.0 percent by weight. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42

document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

For Plant No. 2, pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-4.1, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per 12-month period with compliance determined at the end of each month, with a maximum styrene content of the resins used of 60.0 percent by weight.

Plant 1 and Plant 2 are subject to the following workplace standards:

(i) All resins and gelcoats will be applied with air-assisted airless spray applicators.
(ii) Spray applicators will be cleaned with acetone.
(iii) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring loaded closures.
(iv) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.
(v) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.
(vi) The overspray shall be minimized by spraying as close as practical into the molds.
(vii) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.
(viii) All solvent other than acetone sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
(ix) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

**Compliance Requirements**

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The additional compliance monitoring requirements applicable to this source are as follows:

(1) Pursuant to 326 IAC 20-25-5 (Testing Requirements):

Compliance with the HAP monomer content and usage limitations shall be determined using one (1) of the following:

(a) The manufacturer's certified product data sheet.
(b) The manufacturer's material safety data sheet.
(c) Sampling and analysis, using any of the following test methods, as applicable:
  (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resinsor gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

(2) Pursuant to 326 IAC 20-25-6 (Record Keeping Requirements), the owner or operator of emission units subject to this rule shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Examples of such records include but are not limited to:

(a) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(b) A log of the dates of use;

(c) Method of application and other emission reduction techniques for each resin and gel coat used;

(d) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

Pursuant to 326 IAC 20-25-7 (Reporting Requirements):

On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3 shall submit a quarterly summary report and supporting calculations. The report submitted by the permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Pursuant to 326 IAC 20-25-8 (Operator Training):

(e) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.
(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

Other compliance monitoring requirements remain unchanged from Significant Permit Modification No. 039-17623-00141.

**Conclusion**

The operation of this fiberglass manufacturing operation shall be subject to the conditions of the

attached proposed Significant Source Modification No. 039-17829-00141 and Significant Permit Modification No. 039-17869-00141.

**CHANGES TO PART 70 PERMIT**

The Part 70 permit is modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The facility descriptions in Section A.2 is modified to correctly identify emission units and stacks, and move insignificant activities to Section A.3:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 2:

(a) Gelcoat booth, identified as ~~0243~~ **P2-G**, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack ~~E-1~~ **S4**.

(b) Resin chop area, identified as ~~3069~~ **P2-R**, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~E-2~~ **S7 and S8.**

(c) Resin chop area, identified as ~~4779~~ **P2-LTGR for applying lite-gran coating only**, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~E-3~~ **S2 and S3.**

(d) Grinding area, identified as ~~0778~~ **P2-GRIND with two (2) grinders**, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~D-1 & 2~~ **S5 and S6**.

Plant 1:

(e) ~~One (1)~~ **Two (2)** gelcoat booth**s**, known as ~~E-1~~ **P1-G1 and P1-G2**, **each** equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, **each with** capacity: 7.5 fiberglass parts per hour**, exhausting to stacks S11 and S12, respectively.**

(f) One (1) resin booth, known as ~~E-2~~ **P1-R**, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour**, exhausting to stack S13**.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as **P1-GRIND** ~~D-1 and D-2~~, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour**, exhausting to stacks S9 and S10** .

(h) ~~Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.~~ **One (1) Resin Transfer Molding (RTM) area, using a closed molding process, using 30,000 pounds per year of styreneated resins.**

~~(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.~~

~~(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.~~

~~(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.~~

(2) Section A.3 is modified as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, **mold release, use of sealers, primers, wood glues, and promoter solutions, mold repair activities,** and grinding.

**(f) Four (4) natural gas-fired infrared space heaters in Plant 1, capacity: 0.125 million British thermal units per hour, each.**

**(g) Four (4) natural gas-fired radiant space heaters in Plant 1, capacity: 0.150 million British thermal units per hour, each.**

**(h) One (1) natural gas-fired air make-up unit in Plant 1, capacity: 4.1 million British thermal units per hour.**

**(i) Two (2) natural gas-fired office furnaces in Plant 1, capacity: 0.100 million British thermal units per hour, each.**

**(j) The following activities in Plant 1 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: application of a black coating (Black Flat Lacquer) to bumpers, using an air atomization spray gun; application of an adhesive product called IPS Adhesive and Applicator to glue metal screens to plastic bumpers, using an air atomization spray gun.**

**(k) The following activities (associated with gelcoat application booths) with emissions below exemption levels as defined in 326 IAC 2-1.1-3: use of a liquid organic peroxide use to**

**initiate polymerization reaction; and the use of small quantities of Magnum Shield 1050 (Blue) to assist with resin application, using a dedicated airless air-assisted spray gun in each booth.**

**(l) Manual application out of a tube of Laminex Fillet Putty in Plant 1 and Plant 2 for minor repairs.**

**(m) Application of a two-part packaging foam called Instapak to protect final fiberglass parts during shipment.**

**(n) The following activities in Plant 1 and Plant 2 final finish area with emissions below exemption levels as defined in 326 IAC 2-1.1-3: application of a blue layout fluid called Steel Blue DX-100 to look for cracks and defects.**

(3) Facility description in section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]:

Plant 2:

(a) Gelcoat booth, identified as ~~0243~~ **P2-G**, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack ~~E-1~~ **S4**.

(b) Resin chop area, identified as ~~3069~~ **P2-R**, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~E-2~~ **S7 and S8.**

(c) Resin chop area, identified as ~~4779~~ **P2-LTGR for applying lite-gran coating only**, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~E-3~~ **S2 and S3.**

(d) Grinding area, identified as ~~0778~~ **P2-GRIND with two (2) grinders**, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack**s** ~~D-1 & 2~~ **S5 and S6**.

Plant 1:

(e) ~~One (1)~~ **Two (2)** gelcoat booth**s**, known as ~~E-1~~ **P1-G1 and P1-G2**, **each** equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, **each with** capacity: 7.5 fiberglass parts per hour**, exhausting to stacks S11 and S12, respectively.**

(f) One (1) resin booth, known as ~~E-2~~ **P1-R**, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour**, exhausting to stack S13**.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as **P1-GRIND** ~~D-1 and D-2~~, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour**, exhausting to stacks S9 and S10** .

(h) ~~Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.~~ **One (1) Resin Transfer Molding (RTM) area, using a closed molding**

**process, using 30,000 pounds per year of styreneated resins.**

~~(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.~~

~~(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.~~

~~(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.~~

(4) Condition D.1.1 is modified as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

(a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than ~~250~~ **244** tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) ~~and 40 CFR 52.51~~ not applicable. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

(5) Condition D.1.3 is added for emission standards for reinforced plastics Composites fabricating [326 IAC 20-25-3]

**D.1.3 Emission Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]**

**Pursuant to 326 IAC 20-25-3, the owners or operators of this fiberglass boat manufacturing facility shall comply with the provisions of the rule on or after January 1, 2002, including:**

**(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:**

| Fiber Reinforced Plastics Composites Products Except Watercraft | HAP Monomer Content, Weight Percent |
|---|---|
| **Resin, manual or mechanical application** | **48** |
| **Production - Specialty products** | **35** |
| **Production - Non-corrosion resistant unfilled** | **38** |
| **Production - Non-corrosion resistant filled** | **38** |
| **Production - Non-corrosion resistant, applied to thermoformed thermoplastic sheet** | **42** |
| **Production - Class I, Flame and Smoke** | **60** |
| **Shrinkage controlled** | **52** |
| **Tooling** | **43** |
| **Gelcoat application** | |
| **Production - Pigmented** | **37** |

| | |
|---|---|
| **Clear production** | **44** |
| **Tooling** | **45** |
| **Production - pigmented, subject to ANSI standards** | **45** |
| **Production - clear, subject to ANSI standards** | **50** |

**(b) The following categories of materials shall be applied using mechanical nonatomized application technology or manual application:**

**(1) Production noncorrosion resistant, unfilled resins from all sources.**
**(2) Production, specialty resins from all sources.**
**(3) Tooling resins used in the manufacture of water craft.**
**(4) Production resin used for Class I flame and smoke products.**

**(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:**

**(1) Nonatomized application technology.**
**(2) Air-assisted airless.**
**(3) Airless.**
**(4) High volume, low pressure.**
**(5) Equivalent emission reduction technologies to subdivisions (2) through (4).**

**(d) Cleaning operations for resin and gel coat application equipment are as follows:**

**(1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.**
**(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.**
**(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.**

**(e) Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below. The owner or operator of a source subject to this rule may comply with this section using monthly averaging within each resin or gelcoat application category as described below:**

**For Averaging within a category:**

**$\sum Em_A \leq \sum (M_R * E_a)$**

**Where:**

**$M_R$ = Total monthly mass of material within each category**
**$E_a$ = Emission factor for each material based on allowable monomer content and allowable application method for each category.**
**$Em_A$ = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls**

**(f) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in subsections (a) through (d).**

**(1) Use of monthly emissions averaging for any or all of the material or application categories listed in subsection (a) if the following conditions are met:**

**(A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of subsections (a) through (c).**
**(B) The source uses any one (1) or a combination of the following emission reduction techniques:**

**(i) Resins or gel coats with HAP monomer contents lower than specified in subsection (a).**
**(ii) Vapor suppressed resins.**
**(iii) Vacuum bagging or other similar technique.**
**(iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.**
**(v) controlled spray used in combination with automated actuators or robots.**
**(vi) Controlled spray that includes the following:**

**(AA) Mold flanges.**
**(BB) Spray technique.**
**(CC) Spray gun pressure.**
**(DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.**

**(viii) Emission reduction techniques approved under subdivision (1).**

**(g) To determine emission estimates, the following references or methods shall be used:**

**(1) "Unified Emission Factors for Open Molding of Composites", April 1999, except use of controlled spray emission factors must be approved by the commissioner.**
**(2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and Supplements, January 1995, except for hand layup and spray layup operations emission factors.**
**(3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.**

(6) Condition D.1.6 is added for work practice standards for reinforced plastic composites fabrication.

**D.1.6 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]**

**Pursuant to 326 IAC 20-25-4 (Work Practices Standards):**

**On or Before March 1, 2001, each owner or operator of a source or emission unit subject to this rule shall operate in accordance with the following work practices standards:**

**(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.**
**(b) Except for mixing containers as described in subsection (7), HAP containing materials shall be in a closed container when not in use.**
**(c) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers.**
**(d) Solvent collection conditions shall be kept closed when not in use.**
**(e) Clean-up rags with solvent shall be closed when not in use.**
**(f) Closed containers shall be used for the storage of the following:**
**(1) All production and tooling resins that contain HAPs.**
**(2) All production and tooling gel coats that contain HAPs.**
**(3) Waste resins and gel coats that contain HAPs.**
**(4) Cleaning materials, including waste cleaning materials.**
**(5) Other materials that contain HAPs.**

**(g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times when material is being added to or removed from a container, or mixing or pumping equipment is being placed in or removed from a container.**

(7) The following subsections in Section D.1 are re-numbered due to the addition of 326 IAC 20-25-3 requirements:

D.1. ~~3~~ **4** Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.1. ~~4~~ **5** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(8) Condition D.1.7 is added for operator training for reinforced plastic composites fabrication.

**D.1.7 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]**

**Pursuant to 326 IAC 20-25-8 (Operator Training):**

**All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications ( for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:**

**(a) All personnel hired after March 1, 2001 shall be trained within fifteen (15) days of hiring.**

**(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.**

**(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.**

**(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.**

**(e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.**

**(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:**

**(1) Appropriate application techniques.**
**(2) Appropriate equipment cleaning procedures.**
**(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.**

(9) Condition D.1.6 is modified as follows (and re-numbered due to the addition of three (3) subsections as described above):

D.1.~~6~~ **9** **Hazardous Air Pollutants (HAP) and** Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D 1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance with the HAP monomer content limitations in Condition D.1.3 shall be determined by one of the following:**

**(a) The manufacturer's certified product data sheet.**

**(b) The manufacturer's material safety data sheet.**

**(c) Sampling and analysis, using one of the following test methods, as applicable:**

**(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and VOC content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.**

**(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.**

**(d) An alternate method approved by IDEM/OAQ.**

(10) Condition D.1.9 is modified as follows (as well as re-numbered):

D.1.~~9~~ **12** Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks **(S1, S2, S3, S4, S7, S8, S11, S12, and S13)** ~~(E1, E2, E3)~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(11) Condition D.1.10 is modified as follows and renumbered:

D.1.~~10~~ **13** Record Keeping Requirements

(a) To document compliance with Conditions D.1.1**, D.1.2,** and D.1.~~2~~ **3** the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(7)** below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC **and HAP monomer** usage limits and/or the VOC **and HAP monomer** emission limits established in Condition D.1.1**, D.1.2,** and D.1.~~2~~ **3**.

(1) The amount and VOC content of each coating material and solvent used **and HAP monomer content of each resin and gel coat used**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used**, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat**. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The non-acetone cleanup solvent usage for each month;

(4) The total VOC usage for each month; ~~and~~

(5) The weight of VOCs emitted for each compliance period;

**(6) Method of application and other emission reduction techniques for each resin and gel coat used; and**

**(7) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.**

(b) To document compliance with Condition D.1.~~9~~ **12**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

**(c) To document compliance with Condition D.1.7, the permittee shall maintain the following training records:**

**(1) A copy of the current training program.**

**(2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**

( **d** ~~c~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(12) Condition D.1.11 is re-numbered and modified as follows:

D.1.~~11~~ **14** Reporting Requirements

**(a)** A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**(b) On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.3 shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(13) The Part 70 quarterly report for compliance with PSD limit is modified as follows:

Part 70 Quarterly Report

Source Name: Better Way Partners LLC DBA Better Way Products
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141
Facility: Plant 1 and Plant 2
Parameter: VOC
Limit: Less than ~~250~~ **244** tons~~/year~~ **per 12 month period with compliance determined at the end of each month.**

(14) The Table of Contents is modified to change the subsections in D.1.